

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

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DANIELLE RONDINI :

v. :

CHRISTOPHER CONNOR :

Docket No. 2:02-cv-172

COMPLAINT

Danielle Rondini, a resident of Randolph Center, Vermont says:

Introduction

This is a complaint against a Vermont game warden, Christopher Connor, alleging an unlawful search of the person of the plaintiff, Danielle Rondini, in violation of her civil rights. The suit is brought under 42 U.S.C. 1983 and jurisdiction arises under 28 U.S.C. §§ 1331 and 1343. There are also pendent state claims for battery and invasion of privacy.

Count One = Civil Rights

1. On June 16, 2002, Danielle Rondini was fishing with a friend on the White River off Route 14, between Royalton and Sharon, Vermont.

2. She and her friends were confronted by Vermont game wardens Christopher Connor and Kelly Price.

3. While at all times acting in his capacity as a Vermont game warden and under color of state law, Christopher Connor forcibly searched Danielle Rondini without her consent and without probable cause or any other lawful basis.

4. The search was conducted by Warden Connor by running his hands over her body, touching her crotch and her breasts, including lifting her brassiere and feeling her all over her breasts from the outside of her t-shirt.

5. Danielle Rondini objected to the search and was told she had to cooperate and that she had no right to have a female officer present.

6. Game Warden Connor also unlawfully searched the other woman present.

7. Despite a claim that he was looking for drugs, Game Warden Connor did not search Danielle Rondini's handbag.

8. The search was unlawful and unreasonable. It violated Danielle Rondini's constitutional rights and is actionable under 42 U.S.C. 1983.

9. Game Warden Kelly Price stood by and watched.

10. As a result of the conduct of Warden Connor, Danielle Rondini suffered emotional distress, humiliation, and a violation of her constitutional rights.

Count Two = State Law Claim for Battery and Invasion of Privacy

11. Danielle Rondini realleges paragraphs 1 - 10.

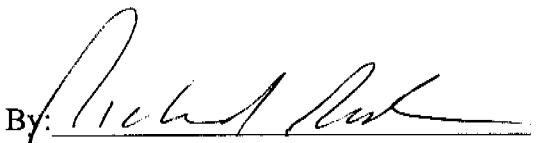
12. Warden Connor's conduct constituted an unlawful, non-consensual battery and invasion of privacy. His conduct was wanton, willful, and outrageous.

WHEREFORE, Plaintiff, Danielle Rondini, seeks compensatory and punitive damages in a reasonable amount and such other and further relief as is just and proper.

Dated at Barre, Vermont this 18 day of July, 2002.

Respectfully submitted,

DANIELLE RONDINI

By: 
Richard I. Rubin, Esq.